

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE
NORTHEAST LLC FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 208 VALLEY ROAD IN THE TOWN
OF NEW CANAAN, CONNECTICUT

DOCKET NO. 401

Date: June 9, 2010

**INTERROGATORY RESPONSES TO CONNECTICUT SITING
COUNCIL FROM APPLICANT T-MOBILE NORTHEAST LLC**

The Applicant, T-Mobile Northeast LLC ("T-Mobile"), submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

1. Did T-Mobile receive return receipts for all adjacent landowners listed in Tab G of the application? If not, describe any additional effort to serve notice.

A1 T-Mobile received return receipts from all of the adjacent landowners listed in Tab G of the Application.

2. Describe any differences in design and site plans between the proposed facility at Silver Hill Hospital and the facility at Silver Hill Hospital that was approved in Council Docket 243.

A2 The proposed telecommunications facility ("Facility") to be located at 208 Valley Road, New Canaan ("Property") differs from the telecommunications facility approved in Docket 243 in the following manner:

1. The centerline of the Facility monopole and compound is approximately 26.5 feet to the north of the centerline of the facility approved in Docket 243.

2. The dimensions of the Facility's lease area are smaller at 25 x 50 feet as opposed to the previous dimensions of 75 x 75 feet.

First, the 2004 analysis relied on the results of a balloon float and reconnaissance of public roads in the area. VHB's analysis relies on both a computer-generated model and in-field reconnaissance (with balloon float). The computer model predicts areas of visibility in those areas that are not publicly accessible to observe and/or photo-document. It appears that the analysis in Docket 243 assumed visibility would be limited to those areas where photographs were obtained documenting the balloon above the trees (i.e. three locations along Valley Road). This assumption is documented on page 2 of the analysis, which states: "Visibilities from most areas outside the public right-of-ways are further obscured by vegetation."

Second, the consultant for Docket 243 conducted the field work in June, during a "leaf on" period, when the deciduous trees were in full leaf. This limitation was merely a matter of timing of that Docket's proceedings and does not diminish the findings presented in Docket 243. VHB had the benefit of conducting its analysis in January, during "leaf off" conditions, when the deciduous trees are dormant and bare of leaves. This difference is important primarily because the analysis in Docket 243 did not include a computer-generated model, which can provide meaningful information for "leaf-off" conditions. Specifically, the computer model incorporated in Docket 401 was used initially to evaluate potential visibility without a vegetation layer (incorporating topography as the sole constraint) as a means to assess areas where views through deciduous trees are possible. The consultant in Docket 243 prepared sight line graphics, a common practice in lieu of computer modeling, to demonstrate areas where direct line of sight views were predicted and also where intervening topography and vegetation might obstruct views of the facility. Although the methodology is not described in the 2004 report, sight lines are typically developed through a combination of publicly-available topographic maps (or electronic data) and a graphics software program.

Third, the Docket 243 analysis did not account for seasonal visibility during "leaf off" conditions. This is likely due to the limitations imposed at the time of year the work was completed (during "leaf on" conditions).

In comparing aerial photographs from 2004 and 2008, it appears that the only new residential development within 0.5 mile of the proposed Facility is the Parkers Glen neighborhood, located approximately 0.2 mile to the west. The proposed Facility would not be visible from this area, as documented in VHB's analysis.

5. What was the result of the March 3, 2010 meeting with New Canaan Town Officials? Did the town provide any comments or recommendations?

A5 The Town of New Canaan ("Town") is in favor of the proposed Facility. In a letter dated March 25, 2010, the Town stated that it supports T-Mobile's efforts to improve wireless coverage in the Town. A copy of the letter is appended hereto as Attachment A.

6. What is the distance and direction of the nearest public and private airfields to the proposed facility?

A6 The closest public airfield is the Westchester County Airport, located in White Plains, New York. This airfield is located approximately fourteen miles southwest of the proposed Facility. The coordinates of this airfield are: 41-04-2.56N / -73-42-22.23W.

The closest private airfield is the Flying Ridge Airstrip, located in Newtown, Connecticut. This airfield is located approximately 16.87 miles northeast of the proposed Facility. The coordinates of this airfield are: 41-22-5.3440N / -73-17-28.4200W.

7. What would be the diameter at the top and base of the tower? What version of the "Structural Standards for Steel Antenna Towers and Antenna Support Structures" will T-Mobile use for the design and construction of the proposed tower?

A7 The proposed Facility would have a uniform diameter of thirty inches. The Facility would conform to standard TIA-EIA-222-G.

8. By how much (in feet) would the tower radius extend onto adjacent properties? Which properties are within the tower radius?

A8 The Facility's tower radius would extend onto one adjacent property approximately forty-nine feet. The property is identified by the Town of New Canaan's Assessor as Map 44, Block 108, Lot 21.

9. What is the distance of the proposed compound to the nearest property boundary?

A9 The distance from the Facility's compound to the nearest property boundary is approximately thirty-nine feet.

10. What is the length of the proposed access walkway? What is the size of the proposed parking area?

A10 The proposed access walkway would be approximately sixty feet. The proposed parking area would be approximately 425 square feet (29 x 13).

11. What amount of cut and fill would be required for construction of the proposed project?

A11 The proposed Facility would require 375 cubic yards of cut and 10 cubic yards of fill (net = 365 cubic yards of cut).

12. Would blasting be required for construction of the proposed project?

A12 T-Mobile does not anticipate any blasting for the proposed Facility; however, T-Mobile has not yet conducted a geotechnical study to confirm soil characteristics.

13. Other than the two 18-inch trees listed under Tab M of the application, would any additional trees that are six inches or greater in diameter have to be removed for the proposed facility?

A13 One additional tree would be removed: a Birch tree with a six inch diameter.

14. What is the percentage of dropped calls that occur on T-Mobile service in the area that would be covered by the proposed facility?

A14 The average dropped call percentage for these cells is 4.11 percent. The following table represents the dropped call percentages for the surrounding cells that provide coverage leading into the coverage area of the proposed Facility (for one month).

Cell	TCH Drop Call%
CT11040D_C	3.24
CT11096A_A	1.11
CT11100A_C	1.29
CT11101B_C	2.80
CT11389A_A	8.65
CT11389A_B	7.59
Average	4.11

15. What is T-Mobile's existing signal strength in the area that would be covered from this site?

A15 T-Mobile's existing signal strength in the Facility's intended coverage area ranges from -80 dBm to -110 dBm.

16. What is the total area (in square feet) that T-Mobile would cover from the proposed site at a signal strength of -84 dBm?

A16 The total area that the proposed Facility would cover at a signal strength of -84dBm is 87,984,230 square feet (3.156 square miles).

17. What is the length of the existing coverage gap along Valley Road and Silvermine Road at a signal strength of -84 dBm?

A17 The length of the existing coverage gap along Valley Road and Silvermine Road at a signal strength of -84dBm, which travels in a northwest to southeast direction, is 2.04 miles. The length of the existing coverage gap along Silvermine Road and New Canaan Road at a signal strength of -84dBm, which travels in a southwest to northeast direction, is 1.74 miles.

18. What is the length of coverage the proposed site would provide along Valley Road and Silvermine Road at a signal strength of -84 dBm?

A18 The length of coverage the Facility would provide along Valley Road and Silvermine Road at a signal strength of -84dBm, which travels in a northwest to southeast direction, is 2.62 miles – with 1.64 miles of new -84 dBm coverage. The length of coverage the Facility would provide along Silvermine Road and New Canaan Road at a signal strength of -84dBm, which travels in a southwest to northeast direction, is 1.77 miles – with 1.37 miles of new -84 dBm coverage.

19. Provide the distance from each existing facility listed behind Tab I of the application to the proposed facility.

A19

Site ID	Distance From CT11098B
27 Cannon Road	3.84 miles
CT11414A	3.77 miles
241/2 Richdale Drive	3.17 miles
CT1101B	2.81 miles
289 Danbury Road	2.73 miles
CT11040D	1.78 miles
CT11389A	1.39 miles
135 Main Street	1.39 miles
CT11076B	2.90 miles
177 West Rocks Road	3.03 miles
CT11356C	3.12 miles
Charles Marshall Drive	3.62 miles
Shirley Street / WNLK Station	3.90 miles

20. Identify existing sites with which the proposed site would hand off signals. If any of these sites are not listed behind Tab I of the application, include address, type and height of tower, height of T-Mobile antennas, and distance and direction from the proposed site.

A20

Site ID	Site Name	Address	Town	Facility Type	Structure height	Antenna Height	Direction From CT11098	Distance From CT11098
CT11040D	Wilton State Police Tower	46 Fernwood Lane	Wilton	Self Support Structure	180 feet	122 feet	Northeast	1.95 miles
CT11096A	New Canaan Downtown	39 Locust Ave	New Canaan	Rooftop	38 feet	46 feet	Northwest	1.46 miles
CT11389A	New Canaan Country Club	95 Country Club Road	New Canaan	Monopole	110 feet	106 feet	Northwest	1.56 miles
CT11100A	Wilton Corporate Center	187 Danbury Road	Wilton	Rooftop	40 feet	65 feet	Northeast	2.92 miles
CT11101B	CL&P Wilton Train Station	15 Old Danbury Road, Pole # 997	Wilton	Utility Pole	90 feet	96 feet	Northeast	2.93 miles

21. What is the estimated cost of T-Mobile's antennas and related ground equipment that would be installed at this site?
- A21 The estimated cost of T-Mobile's antennas and related ground equipment for the proposed Facility would be between \$55,000 and \$65,000.**

Respectfully submitted,

T-MOBILE NORTHEAST LLC

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and First Class U.S. Mail, postage prepaid, to all parties and interveners of record, as follows:

N/A



Jesse A. Langer

ATTACHMENT A

TOWN OF NEW CANAAN

SELECTMAN'S OFFICE
TOWN HALL, 77 MAIN STREET
NEW CANAAN, CT 06840

THOMAS R. STADLER
ADMINISTRATIVE OFFICER
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TEL: (203) 594-3002
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March 25, 2010

Mr. Jesse A. Langer
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Attorneys at Law
1115 Broad Street
Bridgeport, CT 06601-1821

Re: Proposed Development of a Telecommunication Facility
208 Valley Road, New Canaan, Connecticut

Dear Mr. Langer:

Thanks for visiting with First Selectman Walker and me on February concerning the telecommunication facility at 208 Valley Road.

We support your efforts to improve the cell phone service in the Town of New Canaan. As discussed with you in our meeting, our desire is to have the best coverage possible for our town so we strongly support other carriers co-locating on existing or new towers.

Also, we are very interested in taking advantage of your offer to make reasonable space available on the proposed silhouette pole for municipal antennas, at no cost to the Town.

Thank you for asking for our recommendations and comments.

Regards,

